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continued on next page]*

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

18 | K.A.,

CASE NO. 2:24-cv-04786-WLH-ADS

19 Plaintiff,

**REDWOOD DEFENDANTS'
NOTICE OF FILING IN RELATED
CASE**

21 MINDGEEK S.A.R.L. a foreign entity;
22 MG FREESITES, LTD., a foreign
entity; MINDGEEK USA
23 INCORPORATED, a Delaware
corporation; MG PREMIUM LTD, a
foreign entity; MG GLOBAL
24 ENTERTAINMENT INC., a Delaware
corporation; 9219-1568 QUEBEC, INC.,
25 a foreign entity; BERND BERGMAIR,
a foreign individual; FERAS ANTOON,
26 a foreign individual; DAVID
27 TASSILLO, a foreign individual; VISA
INC., a Delaware corporation;
28 REDWOOD CAPITAL
MANAGEMENT, LLC, a Delaware

1 limited liability company; REDWOOD
2 DOE FUNDS 1-7; COLBECK
3 CAPITAL MANAGEMENT, LLC, a
4 Delaware company, COLBECK DOE
5 FUNDS 1-3,

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Defendants.

1 [Additional Counsel for Defendant continued from caption page]
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1 TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that, pursuant to the Court's Order granting leave
3 for each Defendant to file by March 21, 2025 a supplemental brief of 10 pages or less
4 on any issue relating to the Defendant's Motion to Dismiss, and Order Granting Joint
5 Stipulation to Request Limited Coordination for Purposes of Responding to
6 Complaints in Related Cases, on March 21, 2025, Defendants Redwood Capital
7 Management, LLC, Redwood Master Fund, Ltd., Redwood Opportunity Master Fund,
8 Manuel 2018, LLC, Ginogerum, LLC, and White-Hathaway Opportunity Fund, LLC
9 (collectively, "Redwood") have filed in *Fleites v. MindGeek S.à.r.l., et al.*, No. 2:21-
10 cv-4920-WLH-ADS (C.D. Cal. 2021) (the "Fleites Action") Supplemental Briefing
11 in Support of its Motions to Dismiss Plaintiffs' Complaints (and supporting
12 documents) in the Fleites Action and each of the following related 14 actions pending
13 before this Court (the "Related Actions"):

- 14 a. *K.A. v. MindGeek, S.à.r.l., et al.*, No. 2:24-cv-04786-WLH-ADS
15 (C.D. Cal. June 7, 2024);
- 16 b. *N.L. v. MindGeek S.à.r.l., et al.*, No. 2:24-cv-04788-WLH-ADS
17 (C.D. Cal. June 7, 2024);
- 18 c. *L.T. v. MindGeek S.à.r.l., et al.*, No. 2:24-cv-04791-WLH-ADS
19 (C.D. Cal. June 7, 2024);
- 20 d. *T.C. v. MindGeek S.à.r.l., et al.*, No. 2:24-cv-04795-WLH-ADS
21 (C.D. Cal. June 7, 2024);
- 22 e. *X.N. v. MindGeek S.à.r.l., et al.*, No. 2:24-cv-04800-WLH-ADS
23 (C.D. Cal. June 7, 2024);
- 24 f. *N.Y. v. MindGeek S.à.r.l., et al.*, No. 2:24-cv-04801-WLH-ADS
25 (C.D. Cal. June 7, 2024);
- 26 g. *J.C. v. MindGeek S.à.r.l., et al.*, No. 2:24-cv-04971-WLH-ADS
27 (C.D. Cal. June 12, 2024);

- 1 h. *W.L. v. MindGeek S.à.r.l., et al.*, No. 2:24-cv-04977-WLH-ADS
2 (C.D. Cal. June 13, 2024);
- 3 i. *C.S. v. MindGeek S.à.r.l., et al.*, No. 2:24-cv-04992-WLH-ADS
4 (C.D. Cal. June 13, 2024);
- 5 j. *S.O. v. MindGeek S.à.r.l., et al.*, No. 2:24-cv-04998-WLH-ADS
6 (C.D. Cal. June 13, 2024);
- 7 k. *L.S. v. MindGeek S.à.r.l., et al.*, No. 2:24-cv-05026-WLH-ADS
8 (C.D. Cal. June 14, 2024);
- 9 l. *W.P. v. MindGeek S.à.r.l., et al.*, No. 2:24-cv-05185-WLH-ADS
10 (C.D. Cal. June 20, 2024);
- 11 m. *A.K. v. MindGeek S.à.r.l., et al.*, No. 2:24-cv-05190-WLH-ADS
12 (C.D. Cal. June 20, 2024); and
- 13 n. *J.L. v. MindGeek S.à.r.l., et al.*, No. 2:24-cv-07046-WLH-ADS
14 (C.D. Cal. June 20, 2024).

15 Redwood's Supplemental Briefing includes arguments and bases to dismiss
16 the near facsimile claims for conspiracy to violate federal sex-trafficking laws (18
17 U.S.C. §§ 1591, 1594, and 1595) asserted by the Plaintiffs in the *Fleites* Action and
18 the Related Actions pursuant to Rule 12(b)(6) of the Federal Rules of Civil
19 Procedure.

20 DATED: March 21, 2025

PAUL HASTINGS LLP

22 By: /s/ James M. Pearl
23 JAMES M. PEARL

24 *Attorneys for Defendants Redwood*
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27 *Master Fund, Ltd, Manuel 2018, LLC,*
28 *Ginogerum, LLC, and White-Hathaway*
Opportunity Fund, LLC